

## Steve Zissou & Associates

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June 11, 2019

**BY ECF**

Honorable Pamela K. Chen  
United States District Judge  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States of America v. Ahmad Sheikhzadeh*, Docket Number 15-Cr-182 (PKC)  
Unopposed Motion to Release Passports

Dear Judge Chen:

I am pleased to advise the Court that Dr. Sheikhzadeh's term of supervised release will terminate on July 5, 2019. It is my understanding that he has complied with all of the conditions of supervision, and there is no reason to believe that he will not complete this portion of his sentence. Accordingly, and for the reasons set forth below, I write to request that the Court issue an order releasing Dr. Sheikhzadeh's passports forthwith.

Dr. Sheikhzadeh has scheduled a trip to visit his family in the Islamic Republic of Iran. The departure date is July 11, 2019. While this date is *after* the anticipated date on which his period of supervised release comes to an end, he is concerned that his passport may not be released in time to ensure that he can complete the travel requirements. Given the fact that Dr. Sheikhzadeh has demonstrated that he is not a risk of flight together with the impending completion of supervised release, there does not appear to be any reason for pretrial services to continue to retain possession of his passports.

I have discussed this application with United States Probation Officer, Zondra Jackson (SDNY), and she advised me that the U.S. Probation Department consents. I have also discussed this application with AUSA Craig Heeren, and he advised me that the government does not object.

Thank you very much for your consideration in this matter.

Respectfully submitted,

/s/

Steve Zissou

cc: Zondra\_Jackson@nysp.uscourts.gov  
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